

1 Jerry S. Smith (SBA #19599)
 2 JERRY S. SMITH, PLLC
 3 145 S. Sixth Avenue
 4 Tucson, Arizona 85701-2007
 Phone: (520) 326-0134
 E-mail: jsmith@jsslawpllc.com
Attorney for Plaintiff

5 Teri L. Danish (SBA #031452)
 6 MCGUIREWOODS LLP
 7 600 Travis, Suite 7500
 Houston, Texas 77002
 Phone: 832.214.9911
 Email: tdanish@mcguirewoods.com
Attorney for Defendant

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **FOR THE DISTRICT OF ARIZONA**

12 PAMELA C. SULLIVAN,)	C.A. NO. 4:13-cv-01166-BGM
)	
13 Plaintiff,)	
)	
14 v.)	JOINT SETTLEMENT
)	STATUS REPORT
15 BANK OF AMERICA, NATIONAL)	
16 ASSOCIATION,)	
)	
17 Defendant.)	
18)	

19 Plaintiff Pamela C. Sullivan (“PCS”), by and through JERRY S. SMITH, PLLC, her
 20 undersigned attorney of record, and Defendant Bank of America, National Association (“BOA”),
 21 by and through Teri L. Danish, of MCGUIREWOODS, LLP, its undersigned attorney of record,
 22 submit this Joint Settlement Status Report, pursuant to the Scheduling Order filed January 29,
 23 2014, Dkt. #24, Order G:

24 PCS submitted a written settlement proposal to BOA on May 2, 2014, which BOA has
 25 rejected, without any counter-offer. The parties have now completed discovery and the
 26 discovery period has closed. Plaintiff filed a formal motion to compel, which has been fully
 27
 28

1 briefed by both parties (Dkt. #72, 73, and 74) and is currently pending before the Court. BOA
2 timely filed a motion for summary judgment (Dkt. #75; 76), which is also pending before the
3 Court. Per Plaintiff's request, the parties filed a joint stipulation (Dkt. #78) to extend Plaintiff's
4 deadline to respond to Defendant's motion for summary judgment until thirty (30) days after the
5 Court has ruled on Plaintiff's motion to compel

6 Neither party requests a settlement conference or mediation at this time.

7 Respectfully submitted this 19th day of January 2016.

8 JERRY S. SMITH, PLLC

9
10 By: /s/ Jerry S. Smith (w/permission)
JERRY S. SMITH, Attorney for Plaintiff

11
12 MCGUIREWOODS LLP

13 By: /s/ Teri L. Danish
14 TERI L. DANISH, Attorney for Defendant

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on January 19, 2016, the foregoing document was duly served in
17 accordance with the provisions of Rule 5 of the Federal Rules of Civil Procedure.

18 /s/ Teri L. Danish
19 TERI L. DANISH
20
21
22
23
24
25
26
27
28